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VIA ECF
July 29, 2024

Hon. Tonianne J. Bongiovanni, U.S.M.J.
United State Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: Sayer Technologies, S.L. v. Viscofan Collagen USA, Inc.
Civil Action No.: 23-2257 (MAS)

Dear Judge Bongiovanni:

This office represents the Plaintiff, Sayer Technologies, S.L., in the above referenced matter. As You Honor may recall, Sayer Technologies filed a Complaint on April 24, 2023 seeking payment for materials and services provided. Thereafter, Defendant filed an Answer with Counterclaim on May 30, 2023 to which Sayer responded on June 20, 2023. Defendant then filed an Answer with Amended Counterclaims on July 11, 2023 wherein they alleged various allegations which were previously addressed in Court actions in Spain. Sayer responded to the Amended Counterclaims on July 25, 2023. With the Court's permission, Sayer filed a motion for summary judgment on December 8, 2023 but briefing was stayed to determine whether Defendant's required any discovery to address the Motion.

Defendant submitted it's request for discovery on December 22, 2023 to which Sayer objected on December 29, 2023 and Defendant responded on January 4, 2024. Pursuant to a Status Conference on March 8, 2024, Defendant was to provide a transcribed report in its entirety which was done.

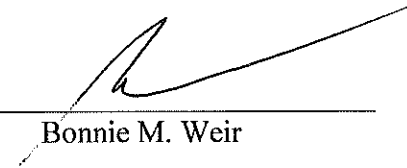
As I am sure Your Honor can appreciate, Sayer is anxious to have this matter proceed as it has been almost 8 months since the filing of the Motion for summary judgment and a year and 3 months since

the action was commenced. To that end, my client would greatly appreciate if Your Honor could advise if You require any further information before making a determination as to Defendant's request for discovery before responding to the Motion for summary judgment.

Thank You for Your time and attention to this matter and I await Your Honor's response.

Respectfully submitted,

THE WEIR LAW FIRM, LLC

By: 
Bonnie M. Weir

Cc: Dariush Keyhani, Esq. (Via email)
Client (via email)